REMARKS

I.　Introduction

Claims 19-36 are pending in the present application. The outstanding issues in the current Office Action are as follows:

- The Information Disclosure Statement is objected to as not including copies of non-patent literature;
- Claims 19-32, 35, and 36 stand rejected under 35 U.S.C. § 102(e); and
- Claims 33 and 34 stand rejected under 35 U.S.C. § 103(a).

In response, Applicant respectfully traverses the outstanding claim rejections, and requests reconsideration and withdrawal in light of the remarks presented herein.

II.　Information Disclosure Statement

Applicant has filed with this Response a revised Information Disclosure Statement ("IDS") that includes copies of the non-patent literature cited in the previously submitted IDS.

III.　Claim Rejections Under 35 U.S.C. § 102(e)

Claims 19-32, 35, and 36 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Brodsky* (U.S. Pat. No. 5,809,471). Office Action, page 2. Applicant respectfully traverses the rejection of record and asserts that the claims are allowable for the reasons stated below.

In order anticipate a claim under 35 U.S.C. § 102, a reference must teach every element of the claim. *See* M.P.E.P. § 2131. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." M.P.E.P. 2131, citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). Moreover, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim." M.P.E.P. § 2131, citing *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989).

A.   Claims 19-28

Claim 19 recites, in part, "[a] method for searching in a multimedia signal . . . ." The Examiner relies upon the following passage as meeting this limitation:

> [u]pon recognition of the request, a search is initiated to access, import and deliver to the user the information required to satisfy the request. *Brodsky*, column 1, lines 60-62.

Applicant asserts that *Brodsky* performs the search in a database, not in a multimedia signal. *See, e.g., Brodsky*, column 6, lines 28-32. Moreover, although *Brodsky* teaches "extract[ing] words and/or items from an audio, video, or telephony signal" (*see, e.g., Brodsky*, column 4, lines 40-44), Applicant points out that merely extracting information from a signal is not the same as searching within the signal. *Brodsky* merely extracts words from a signal to create a dictionary of recently received words. *Brodsky*, column 6, lines 49-61. Accordingly, Applicant respectfully requests that the Examiner withdraw the § 102(e) rejection of record with respect to claim 19.

Claim 19 also recites, in part, that the "multimedia signal includes at least a first data format component and a second data format component . . . ." The Examiner relies upon *Brodsky*'s "retrieved additional information" as meeting the "second data format component" of the claimed multimedia signal. Office Action, pages 2-3. However, *Brodsky*'s retrieved information is not a part of the multimedia signal. In fact, *Brodsky*'s multimedia signal (carrying a TV or telephone signal) and retrieved signal (carrying the retrieved additional information) each originate from different sources and reach the display (108) through completely distinct paths. *Brodsky*, column 2, lines 34-39; Figure 1. Therefore, *Brodsky*'s retrieved additional information does not meet the claimed "second data format component" because it is not a part of the multimedia signal. Accordingly, Applicant respectfully requests that the Examiner withdraw the § 102(e) rejection of record with respect to claim 19.

Claim 19 further recites, in part, "analyzing the first data format component of the multimedia signal to identify occurrences of the search parameter . . . ." The Examiner contends that *Brodsky* teaches the claimed limitation. Office Action, page 3. However, at the passages cited by the Examiner, *Brodsky* discloses analyzing a vocabulary to identify occurrences of the user's request. *Brodsky*, column 2, lines 25-27, 30-32, and 60-62.

Applicant points out that *Brodsky*'s vocabulary is a dynamically changing dictionary made up of information extracted from the multimedia signal by a content extractor (102) and stored in a buffer (104). *Brodsky*, column 1, lines 55-60; column 2, lines 55-58; figure 1. As such, *Brodsky*'s vocabulary is not a part of the multimedia signal. Accordingly, Applicant respectfully requests that the Examiner withdraw the § 102(e) rejection of record with respect to claim 19.

In addition, claim 19 recites, in part, "for at least one occurrence of the search parameter in the first data component, presenting a corresponding second data format segment of the multimedia signal." The Examiner contends that *Brodsky* teaches the claimed limitation. Office Action, page 3. However, at the passages cited by the Examiner, *Brodsky* discloses that when a user's request matches a dictionary entry, information is retrieved from a database application (112) and presented to the user. *Brodsky*, column 2, lines 35-39; column 3, lines 33-36. As noted above, *Brodsky*'s vocabulary is not a part of the multimedia signal, hence an occurrence of a search parameter in *Brodsky* is not the same as an "occurrence of the search parameter in the first data component" of a multimedia signal, as required by the claim. Furthermore, *Brodsky*'s retrieved signal stream (carrying the additional retrieved information) is not a part of the multimedia signal and thus *Brodsky* does not teach or suggest "presenting a corresponding second data format segment of the multimedia signal." Accordingly, Applicant respectfully requests that the Examiner withdraw the § 102(e) rejection of record with respect to claim 19.

Dependent claims 20-28 depend either directly or indirectly from claim 19 and thereby inherit all the limitations of that independent claim. As noted above, *Brodsky* does not teach every element of independent claim 19. Consequently, *Brodsky* also fails to teach every element of dependent claims 20-28. Accordingly, Applicant respectfully requests that the 35 U.S.C. § 102(e) rejection of record with respect to claims 20-28 be withdrawn.

B.   Claims 29-32, 35, and 36

Claim 29 recites, in part, "analyzing a first data format component of the multimedia signal to identify occurrences of a search parameter . . . ." As previously noted, *Brodsky* discloses analyzing a vocabulary to identify occurrences of the user's request. *Brodsky*, column 2, lines 25-27, 30-32, and 60-62. Applicant points out that *Brodsky*'s vocabulary is a

dynamically changing dictionary made up of information extracted from a multimedia signal by a content extractor (102) and stored in a buffer (104). *Brodsky*, column 1, lines 55-60; column 2, lines 55-58; figure 1. Therefore because *Brodsky*'s vocabulary is not a part of the multimedia signal, *Brodsky* does not teach or suggest the claimed limitation. Accordingly, Applicant respectfully requests that the Examiner withdraw the § 102(e) rejection of record with respect to claim 29.

Claim 29 also recites, in part, "for at least one occurrence of the search parameter in the first data component, identifying a corresponding segment of a second data format component in the multimedia signal." Again, *Brodsky* discloses that when a user's request matches a dictionary entry, information is retrieved from a database application (112) and presented to the user. *Brodsky*, column 2, lines 35-39; column 3, lines 33-36. *Brodsky*'s vocabulary is not a part of the multimedia signal, hence an occurrence of a search parameter in *Brodsky* is not the same as an "occurrence of the search parameter in the first data component" of a multimedia signal, as required by the claim. Furthermore, *Brodsky*'s retrieved signal stream (carrying the additional retrieved information) is not a part of the multimedia signal. Therefore, *Brodsky* does not teach or suggest "presenting a corresponding second data format segment of the multimedia signal." Accordingly, Applicant respectfully requests that the Examiner withdraw the § 102(e) rejection of record with respect to claim 29.

Dependent claims 30-32, 35, and 36 depend either directly or indirectly from claim 29 and thereby inherit all the limitations of that independent claim. As noted above, *Brodsky* does not teach every element of independent claim 29. Consequently, *Brodsky* also fails to teach every element of dependent claims 30-32, 35, and 36. Accordingly, Applicant respectfully requests that the 35 U.S.C. § 102(e) rejection of record with respect to claims 30-32, 35, and 36 be withdrawn.

IV.   Claim Rejections Under 35 U.S.C. § 103(a)

Claims 33 and 34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Brodsky* in view of Official Notice. Office Action, pages 6 and 7. Applicant respectfully traverses the rejection of record and asserts that the claims are allowable, at least, for the reasons stated below.

To establish a prima facie case of obviousness under 35 U.S.C. § 103(a), three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the references' teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* M.P.E.P. § 2143.

Claims 33 and 34

As noted above, *Brodsky* fails to teach or suggest "analyzing a first data format component of the multimedia signal to identify occurrences of a search parameter; and for at least one occurrence of the search parameter in the first data component, identifying a corresponding segment of a second data format component in the multimedia signal" as required by independent claim 29. The Examiner does not rely upon its Official Notice as teaching or suggesting the above-referenced features. Therefore, the combination of *Brodsky* and Official Notice fails to teach or suggest all of the limitations of independent claim 29. Dependent claims 33 and 34 depend either directly or indirectly from claim 29 and thereby inherit all the limitations of that independent claim. Consequently, the combination of *Brodsky* and Official Notice fails to teach or suggest all of the limitations of dependent claims 33 and 34. Accordingly, Applicants respectfully requests that the Examiner withdraw the § 103(a) rejection of record with respect to claims 33 and 34.
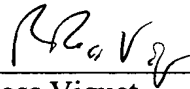
V.   Conclusion

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejections of the claims and to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge Deposit Account No. 06-2380, under Order No. 51410/P043C1/10401539 from which the undersigned is authorized to draw.

Dated: December 27, 2005   Respectfully submitted,

By _____

R. Ross Viguet
Registration No.: 42,203
FULBRIGHT & JAWORSKI L.L.P.
2200 Ross Avenue, Suite 2800
Dallas, Texas 75201-2784
(214) 855-8185
(214) 855-8200 (Fax)
Attorney for Applicant